

1 George Haines, Esq.
2 Nevada Bar No.: 9411
3 Gerardo Avalos, Esq.
4 Nevada Bar No.: 15171
5 **FREEDOM LAW FIRM**
6 8985 S. Eastern Ave., Suite 350
7 Las Vegas, Nevada 89123
8 (702) 880-5554
9 (702) 385-5518 (fax)
10 Ghaines@freedomlegalteam.com

11 Michael Kind, Esq.
12 Nevada Bar No.: 13903
13 **KIND LAW**
14 8860 South Maryland Parkway, Suite 106
15 Las Vegas, Nevada 89123
16 (702) 337-2322
17 (702) 329-5881 (fax)
18 mk@kindlaw.com
19 *Attorneys for Plaintiff Luanne Austin*

20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 Luanne Austin, individually, on behalf
23 of herself and all others similarly
24 situated,

25 Plaintiff,

26 v.

27 Allied Collection Services, Inc.,
Teachers Health Trust dba THT Health,
and Digestive Disease Center dba
Digestive Disease Specialists,

Defendants.

Case No.: 2:21-cv-01593-RFB-NJK

**Stipulation for an extension of time
for Plaintiff to respond to Defendant
Teachers Health Trust's Motion to
Dismiss**

(First request)

1
2 Luanne Austin (“Plaintiff”) and Teachers Health Trust d/b/ a THT
3 Healt (“Defendant and together with Plaintiff as the “parties”), by and
4 through their respective counsel, hereby submit this stipulation for an
5 extension of time for Plaintiff to respond to Defendant’s motion to dismiss,
6 filed on December 13, 2021. This is the first request for an extension of this
7 deadline.

8 The extension is sought because Plaintiff’s counsel requires additional
9 time to prepare an appropriate response to the motion due to anticipated staff
10 shortages during the upcoming holidays.

11 ///

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

1 In good faith and not for the purposes of delay, the parties therefore
2 stipulate that Plaintiff's opposition to the pending motion shall be due on or
3 before **January, 17, 2022**.

4
5 Dated: December 17, 2021.

6 **FREEDOM LAW FIRM**

7 /s/ Gerardo Avalos

8 George Haines, Esq.
9 Gerardo Avalos, Esq.
10 8985 S. Eastern Ave., Suite 350
11 Las Vegas, Nevada 89123
Attorneys for Plaintiff Luanne Austin

12 /s/ John S. Delikanakis

13 John S. Delikanakis, Esq.
14 Joseph Adams, Esq.
15 Gil Kahn, Esq.
16 Christian P. Ogata, Esq.
17 3883 Howard Hughes Parkway, Suite 1100
18 Las Vegas, Nevada 89169-5958
Counsel for Teachers Health Trust dba THT Trust

19
20 IT IS SO ORDERED:

21 

22 _____
23 UNITED STATES DISTRICT JUDGE

24 DATED: December 21, 2021